

RECEIVED

JUN 28 2012

WASH. UT. & TP. COMM

June 22, 2012

RE: 2012 Weyerhaeuser-Ostrander Pipeline Operations and Maintenance Procedures
and Plan Review

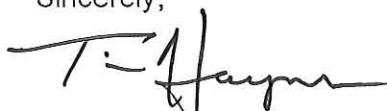
David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Lykken:

Please find attached the Weyerhaeuser Longview response to the 2012 Weyerhaeuser-Ostrander Operations and Maintenance Procedures and Plan Review.

Should you have any questions please do not hesitate to contact us directly.

Sincerely,



Tim Haynes
Vice President/Mill Manager
Longview Operations
Weyerhaeuser Company

cc Cosentino Consulting Inc.
Pipeline facility files

Response to Weyerhaeuser Ostrander Pipeline Operations and Maintenance Procedures and Plan Review

1. WAC 480-93-180 Plans and procedures

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

Finding(s):

The following Weyerhaeuser procedures were not followed or are not adequate to meet the requirements of WAC 480-93-180(1). Specifically:

- a. 49 CFR §192.225 Welding Procedures. Subpart (a) requires operators to perform welding in accordance with procedures qualified under section 5 of API 1104 20th edition. The current welding procedure in Manual is qualified in accordance with the 19th edition of API 1104. You must re-qualify your procedure based on API 1104 20th edition.
- b. 49 CFR §192.751 Prevention of Accidental Ignition. Section 6.1 of the Manual details procedures to use when a hazardous atmosphere may be present while working around natural gas. The lower explosive limit is defined as 5% gas in air. However, this is a general characteristic for natural gas. The procedure does not state what Weyerhaeuser considers hazardous in terms of allowing workers to perform covered tasks. The procedure should identify the hazardous limits in which workers can be exposed while performing covered tasks.

Response(s):

- a. The Weyerhaeuser-Ostrander pipeline will re-qualify the current welding procedures using API Standard 1104, "Welding of Pipelines and Related Facilities" (20th edition, October 2005, errata/addendum, (July 2007) and errata 2 (2008)) as defined in 49CFR192.7 Re-qualification is expected to be complete by October 1, 2012
- b. The Weyerhaeuser-Ostrander pipeline will revise Section 6.1 of the Weyerhaeuser-Ostrander Operations and Maintenance Manual to provide additional guidance on what Weyerhaeuser considers a hazardous atmosphere during the performance of covered tasks. Revision and issue of the revised manual section will be complete by October 1, 2012